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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 DAVID RAMIREZ,
15 Defendant.

Case No. 3:22-cr-00023-ART-CSD-1

ORDER APPROVING

**STIPULATION TO CONTINUE
MOTION DEADLINES**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between JASON M.
18 FRIERSON, United States Attorney, and ANDREW KEENAN, Assistant United States
19 Attorney, counsel for the United States of America, and RENE L. VALLADARES, Federal
20 Public Defender, and KATE BERRY, Assistant Federal Public Defender, counsel for DAVID
21 RAMIREZ, that deadline to file any and all pretrial motions and notices of defense be extended
22 from March 17, 2023 to **March 24, 2023**.

23 IT IS FURTHER STIPULATED AND AGREED, that the parties shall have to and
24 including **April 7, 2023**, to file any and all responsive pleadings.

25 IT IS FURTHER STIPULATED AND AGREED, that the parties shall have to and
26 including **April 14, 2023**, to file any and all replies to dispositive motions.

1 This is the first stipulation to continue the motions deadlines. Counsel is requesting
2 additional time to file pretrial motions mindful of the current trial date of May 23, 2023 at
3 9:30 AM, the exercise of due diligence, in the interests of justice, and not for any purpose of
4 delay.

5 DATED this 14th day of March, 2023.
6

7 RENE L. VALLADARES
8 Federal Public Defender

9 JASON M. FRIERSON
10 United States Attorney

11 /s/ *KATE BERRY*
12 By: _____
13 KATE BERRY
14 Assistant Federal Public Defender
15 Counsel for DAVID RAMIREZ

16 /s/ *Andrew Keenan*
17 By: _____
18 ANDREW KEENAN
19 Assistant United States Attorney
20 Counsel for the Government

21 **IT IS SO ORDERED.**

22 DATED this 16th day of March, 2023.

23 
24 ANNIE R. TRAUM
25 UNITED STATES DISTRICT JUDGE